

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

ePLUS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:09cv620
	)	
LAWSON SOFTWARE, INC.	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR LEAVE TO FILE CORRECTED  
SUMMARY JUDGMENT BRIEF**

Defendant Lawson Software, Inc. ("Lawson"), by counsel, states as follows for its Unopposed Motion for Leave to File Corrected Summary Judgment Brief:

1. In reviewing its Brief in support of its Motion for Summary Judgment [Docket No. 241], Lawson recently discovered that a number of the citations to its Listing of Undisputed Facts were off by one paragraph because of a typographical error. The error was that the paragraph before paragraph 21 in the Undisputed Facts was not given a number. As a result, citations in the brief to the paragraphs after paragraph 21 are all off by one paragraph.

2. Lawson seeks leave to file the corrected Summary Judgment Brief which is filed, under seal, as Exhibit A to this Motion. The only change Lawson has made to the brief has been to correct the numbering in the Listing of Undisputed Facts. Counsel for Lawson has consulted with counsel for Plaintiff ePlus, Inc. and ePlus consents to this Motion. A proposed Order granting this Motion and directing the Clerk to file the attached Exhibit A under seal is attached as Exhibit B.

WHEREFORE, Lawson respectfully requests that the Court grant this Motion and enter the proposed Order attached as Exhibit B.

LAWSON SOFTWARE, INC.

By:                     /s/                      
Of Counsel

Dabney J. Carr, IV, VSB #28679  
Robert A. Angle, VSB #37691  
**TROUTMAN SANDERS LLP**  
P. O. Box 1122  
Richmond, Virginia 23218-1122  
Telephone: (804) 697-1200  
Facsimile: (804) 697-1339  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)  
[robert.angle@troutmansanders.com](mailto:robert.angle@troutmansanders.com)

Daniel McDonald (admitted *pro hac vice*)  
William D. Schultz (admitted *pro hac vice*)  
Rachel C. Hughey (admitted *pro hac vice*)  
Andrew J. Lagatta (admitted *pro hac vice*)  
Joshua P. Graham (admitted *pro hac vice*)  
**MERCHANT & GOULD P.C.**  
3200 IDS Center, 80 South Eighth Street,  
Minneapolis, MN 55402  
Telephone: (612) 332-5300  
Facsimile: (612) 332-9081

*Counsel for Defendant Lawson Software, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on this 25<sup>th</sup> day of June, 2010, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Craig T. Merritt  
Henry I. Willett, III  
**CHRISTIAN & BARTON, LLP**  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
[cmerritt@cblaw.com](mailto:cmerritt@cblaw.com)  
[hwillett@cblaw.com](mailto:hwillett@cblaw.com)

James D. Clements  
Goodwin Procter, LLP  
Exchange Place  
53 State Street  
Boston, MA 02109-2881  
[jclements@goodwinprocter.com](mailto:jclements@goodwinprocter.com)

Scott L. Robertson  
Jennifer A. Albert  
David M. Young (VSB No. 35997)  
Goodwin Procter, LLP  
901 New York Avenue, N.W.  
Washington, DC 20001  
[srobertson@goodwinprocter.com](mailto:srobertson@goodwinprocter.com)  
[jalbert@goodwinprocter.com](mailto:jalbert@goodwinprocter.com)  
[dyoung@goodwinprocter.com](mailto:dyoung@goodwinprocter.com)

*Attorneys for Plaintiff*

\_\_\_\_\_  
/s/  
Dabney J. Carr, IV (VSB No. 28679)  
Robert A. Angle (VSB No. 37691)  
Megan C. Rahman (VSB No. 42678)  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)  
[robert.angle@troutmansanders.com](mailto:robert.angle@troutmansanders.com)  
[megan.rahman@troutmansanders.com](mailto:megan.rahman@troutmansanders.com)  
**TROUTMAN SANDERS LLP**  
1001 Haxall Point  
Richmond, VA 23219  
Telephone: (804) 697-1200  
Facsimile: (804) 697-1339  
*Counsel for Defendant Lawson Software,  
Inc.*